

# COHEN & GREEN

November 7, 2023

**BY ECF**

Hon. Ann M. Donnelly  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Payamps v. City of New York, 22-cv-00563**

Dear Judge Donnelly:

This firm along with co-counsel represents the Plaintiff. We write to respectfully ask for clarification of the Court's Order of earlier today regarding ECF No. 84.

We provided timesheets and a fee demand to the City on October 23. We have not yet received a settlement offer from the City regarding fees, but followed up with defense counsel today. We are unclear whether Your Honor's Order requires us to file a fee application if settlement discussions are still ongoing. If this was the Court's intention, we respectfully request that the Court extend the 11/15 deadline for any fee application by 30 days.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

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Jessica Massimi

*Pronouns: She/Her*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by ECF.